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Attorney for Defendant  
STEVEN DANIEL WOODS

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA, ) 2:21-cr-00100-JAM  
v. )  
Plaintiff, ) STIPULATION AND ORDER  
STEVEN DANIEL WOODS, ) TO CONTINUE STATUS  
Defendant. ) CONFERENCE

## **STIPULATION**

Plaintiff, United States of America, by and through its counsel, Assistant United States Attorney Ross Pearson, and defendant, Steven Daniel Woods, by and through his counsel, Jennifer Mouzis, hereby stipulate as follows:

- 1) By previous order, this matter was set for status on November 8, 2022.
- 2) By this stipulation, defendant now moves to continue the status conference until January 24, 2023, at 9:00 a.m., and to exclude time between November 8, 2022 and January 24, 2023, under Local Code T4.
- 3) The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case includes

1 over one hundred pages of reports, photos, and search warrant documents. All of this  
2 discovery has been either produced directly to counsel and/or made available for  
3 inspection and copying.  
4

- 5 b) Counsel for defendant desires time to review the discovery with her client, research and  
6 investigate possible defenses, discuss any potential resolution with her client, research  
7 mitigating evidence and present it to the prosecution, and otherwise prepare for trial.
- 8 c) Counsel for defendant believes that failure to grant the above-requested continuance  
9 would deny him/her the reasonable time necessary for effective preparation, taking into  
10 account the exercise of due diligence.
- 11 d) The government does not object to the continuance.
- 12 e) Based on the above-stated findings, the ends of justice served by continuing the case as  
13 requested outweigh the interest of the public and the defendant in a trial within the  
14 original date prescribed by the Speedy Trial Act.
- 15 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq.,  
16 within which trial must commence, the time period of November 8, 2022 to January 24,  
17 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv)  
18 [Local Code T4] because it results from a continuance granted by the Court at  
19 defendant's request on the basis of the Court's finding that the ends of justice served by  
20 taking such action outweigh the best interest of the public and the defendant in a speedy  
21 trial.
- 22 4) Nothing in this stipulation and order shall preclude a finding that other provisions of the  
23 Speedy Trial Act dictate that additional time periods are excludable from the period within  
24 which a trial must commence.

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1 IT IS SO STIPULATED.  
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3

4 Dated: November 2, 2022

PHILLIP A. TALBERT  
United States Attorney

5 By: /s/ Ross Pearson  
6 ROSS PEARSON  
7 Assistant United States Attorney

8 Dated: November 2, 2022

9 /s/ Jennifer Mouzis  
JENNIFER MOUZIS  
10 Attorney for Defendant  
11 STEVEN DANIEL WOODS

12 **ORDER**

13 IT IS SO ORDERED.

14 Dated: November 2, 2022

15 /s/ John A. Mendez  
16 THE HONORABLE JOHN A. MENDEZ  
17 SENIOR UNITED STATES DISTRICT JUDGE